IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

UNITED STATES OF AMERICA Plaintiff,)))
v.) Case No.: 2:19-cr-00013
GEORGIANNA A.M. GIAMPIETRO Defendant.) Chief Judge Waverly D. Crenshaw, Jr.)

DEFENSE PROPOSED JURY INSTRUCTIONS (Disputed)

COMES NOW, Defendant, Georgianna Giampietro, by and through undersigned counsel and provides to this Court the defense Disputed Jury Instructions for:

- Count One Attempting to Provide Material Support to A Foreign Terrorist Organization Instruction;
- Unanimity Instruction for Count One;
- Count Two Attempting to Provide Material Support to A Foreign Terrorist Organization;
- Unanimity Instruction for Count Two;
- Count Four Tampering with Evidence Instruction;
- Implicit Bias Instruction; and
- First Amendment Protected Speech Instruction²

A Word/Wordperfect version of these instructions will be emailed to the Court per its Order in D.E. 173.

Respectfully submitted this 23rd day of December, 2021.

/s/ Charles D. Swift
CHARLES D. SWIFT
Pro Hac Attorney for Giampietro
Constitutional Law Center for Muslims in America

¹ Counsel understands that this Court, as a matter of practice, gives the Implicit Bias Jury Instruction included in the Agreed Instructions. Counsel respectfully submits the attached Implicit Bias Jury Instruction for the Court's consideration.

² Counsel recognizes that this instruction may require tailoring based on the state of the evidence at the close of trial.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 23rd day of December, 2021, I electronically filed the

foregoing with the Clerk of the Court using the CM/ECF system which will send a notice of

electronic filing to all counsel of record.

18/ Charles D. Swift

CHARLES D. SWIFT

Pro Hac Attorney for Georgianna Giampietro

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